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14 **UNITED STATES DISTRICT COURT**
15 **EASTERN DISTRICT OF CALIFORNIA**

16 BRIANA LOUISE COUCH, } Case No.: 2:24-cv-01988-EFB
17 Plaintiff, } STIPULATION AND [PROPOSED] ORDER
18 vs. } FOR AN EXTENSION OF TIME
19 FRANK BISIGNANO, }
20 Commissioner of Social Security, }
21 Defendant. }

22 Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the
23 parties, through their respective counsel of record, that the time for Defendant to respond to
24 Plaintiff's Motion for Summary Judgment be extended from July 14, 2025, up to and including
25 August 13, 2025. This is the Defendant's first request for an extension.

26 This matter was assigned on June 19, 2025. Based on a review of the record,
27 undersigned counsel requires additional time to explore settlement options. Defendant
apologizes to the Court for any inconvenience caused by this delay. Undersigned counsel
contacted Plaintiff's counsel on July 11, 2025, and she had no objection to this request.

28 The parties further stipulate that the Court's Scheduling Order shall be modified
accordingly.

1 Respectfully submitted,

2 Dated: July 11, 2025

/s/ Jacqueline A. Forslund*
(*as authorized via e-mail on July 11, 2025)
JACQUELINE A. FORSLUND
Attorney for Plaintiff

5 Dated: July 11, 2025

6 MICHELE BECKWITH
7 Acting United States Attorney
MATHEW W. PILE
Associate General Counsel
8 Social Security Administration

9 By: /s/ Noah Schabacker
10 NOAH SCHABACKER
11 Special Assistant U.S. Attorney
12 Attorneys for Defendant

13 **ORDER**

14 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
15 extension, up to and including August 13, 2025, to respond to Plaintiff's Motion for Summary
16 Judgment.

17 DATED: July 29, 2025

18 
19 EDMUND F. BRENNAN
20 UNITED STATES MAGISTRATE JUDGE